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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New  
York non-profit corporation, and WR PROPERTY  
LLC, a New Jersey limited liability company,

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,  
MICHAEL REINA, ROBERT NIXON, HELENE  
SCHLEGEL, JEFFREY PURPURO, WILLIAM  
CAMPBELL, and KENNETH PIESLAK,

Defendants.

Civ. No. 3:17-DV-03226

**DECLARATION OF SHAYA COHEN**

SHAYA COHEN declares as follows, pursuant to 28 U.S.C. § 1746:

1. I live at 9 Oak Drive in Jackson Township, New Jersey.
2. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
3. I am a member of Agudath Israel.
4. I have an 8 year old son and a 9 year old son. I believe that my children must attend a Jewish school where they will be taught our religious laws and traditions in addition to their secular studies. The school must also follow Jewish laws such as laws of *kashrut* (kosher).
5. There is no school in Jackson for my children to attend which furthers my religious beliefs, so they must attend a school in Lakewood. Between the rides to and from school they are on the bus for at least two hours a day.
6. The bus ride is negatively impacting their day as there are some 40 or so children (from two different schools) stuck in a hot bus for an hour at a time with no adult supervision.
7. They often arrive at school late and exhausted, hindering their capability to pray and study.
8. We've received numerous complaints from the school that my children are coming late and missing prayers.
9. The afternoon bus ride will become even more of an issue in the coming years when my sons reach the age where it is our belief that they should pray the afternoon prayers with a *minyan* (quorum). They will not be back from school in time to be able to do so.

10. If there was a school in Jackson, my sons wouldn't be late to school and wouldn't miss prayers.
11. The ordinances regarding schools do not affect my neighbors whose religious beliefs permit them to send their children to schools in Jackson, but they affect me as an Orthodox Jew.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 8, 2019



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SHAYA COHEN